



**California Environmental Protection Agency  
Department of Toxic Substances Control**

**HAZARDOUS WASTE FACILITY POST CLOSURE PERMIT**

**Facility Name:**

TP Industrial, Inc.  
525 and 535 East Alondra Boulevard  
Gardena, California 90248

**Owner Name:**

Guy R Grant Living Trust  
525 East Alondra Boulevard  
Gardena, California 90248

**Operator Name:**

TP Industrial, Inc.  
2559 N 300 West  
Lehi, Utah 84043

Facility EPA ID Number:  
CAD 097465132

Effective Date:  
November 11, 2010

Expiration Date:  
November 10, 2020

Pursuant to California Health and Safety Code section 25200, this Resource Conservation and Recovery Act (RCRA)-equivalent Hazardous Waste Facility Permit is hereby issued to the TP Industrial, Inc. and the Guy R. Grant Living Trust.

The Issuance of this Permit is subject to the terms and conditions set forth in the Approved Application dated October 29, 2009. The Permit consists of 16 pages and Figures 1, and 2.

**//Original signed by//**

Farshad Vakili, P.E., Team Leader  
Treatment and Storage Team  
Department of Toxic Substances Control  
Date: October 7, 2010

**TP INDUSTRIAL, INC.  
525 AND 535 EAST ALONDRA BOULEVARD  
GARDENA, CA 90248**

**HAZARDOUS WASTE FACILITY POST CLOSURE PERMIT**

**TABLE OF CONTENTS**

PART I. DEFINITIONS .....	2
PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP .....	3
1. OWNER OF FACILITY .....	
2. OWNER OF REAL PROPERTY .....	3
3. OPERATOR OF FACILITY .....	3
4. LOCATION .....	3
5. DESCRIPTION OF FACILITY OPERATIONS .....	
6. FACILITY HISTORY .....	4
7. FACILITY SIZE AND TYPE FOR FEE PURPOSES .....	5
PART III. GENERAL CONDITIONS .....	7
1. PERMIT APPLICATION DOCUMENTS .....	7
2. EFFECT OF PERMIT .....	7
3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) .....	8
4. ENVIRONMENTAL MONITORING .....	8
5. ACCESS .....	9
6. POST-CLOSURE COST ESTIMATE .....	10
PART IV. PERMITTED UNITS AND ACTIVITIES .....	11
PART V. SPECIAL CONDITIONS .....	14
PART VI. CORRECTIVE ACTION .....	15

## **PART I. DEFINITIONS**

All terms used in this Permit shall have the same meaning as those terms have in the California Health and Safety Code, division 20, chapter 6.5 and California Code of Regulations, title 22, division 4.5, unless expressly provided otherwise by this Permit.

1. **“DTSC”** as used in this Permit means the California Department of Toxic Substances Control.
2. **“Facility”** as used in this Permit means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage resource recovery, disposal or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal or recycling operational units or combinations of these units.

For the purpose of implementing corrective action under California Code of Regulations, title 22, division 4.5, a hazardous waste facility includes all contiguous property under the control of the owner or operator required to implement corrective action.

3. **“Permittee”** as used in this Permit means the Owner and Operator.
4. **“RCRA”** as used in this Permit means the Resource Conservation and Recovery Act (42 U.S.C. §6901 et seq.).

## **PART II DESCRIPTION OF THE FACILITY AND OWNERSHIP**

1. **Owner of Facility**

Guy R. Grant Living Trust  
525 East Alondra Boulevard  
Gardena, California 90248-2903  
Trustee: Mr. Guy R. Grant

2. **Owner of Real Property**

Guy R. Grant Living Trust  
525 East Alondra Boulevard  
Gardena, California 90248-2903  
Trustee: Mr. Guy R. Grant

3. **Operator of Facility**

TPI Industrial, Inc.  
2559 N 300 W  
Lehi, Utah 84043

4. **Location**

The TP Industrial, Inc. (Facility) is located at 525 and 535 East Alondra Boulevard, Gardena, California. The Facility is located in an unincorporated area of Los Angeles County, California adjacent to Gardena and Carson, about one mile east of the Harbor Freeway (I10) and west of the Alondra and Avalon Boulevard intersection. The location of the Facility is shown on Figure 1. The site is located on two parcels identified by Los Angeles County assessor's parcel numbers 6125012015 and 6125012016.

5. **Description of Facility Operations**

The Facility formerly stored, blended and distributed virgin chlorinated and fluorinated organic solvents non-halogenated solvents from 1966 to 1986. During its operation, the solvent handled by the Facility included the following; 1,1,2-trichloro-1,2,2-trifluoroethane (Freon-113, CFC-113), 1,1,1-trichloroethane (TCA), trichloroethylene (TCE), tetrachloroethene (PCE), dichloroethene, dichloroethane, methylene chloride, acetone, methanol and isopropanol.

The subject of this permit includes two areas: 1) three former underground storage tanks and 2) a former three-stage clarifier, which is also known as the three-stage sump (See Figure 2, Hazardous Waste Management Units 1, 2, 3 and 10).

The soil and groundwater were impacted by the releases of solvent during the Facility's operation. In 1988, a soil venting and groundwater treatment system was installed to extract the groundwater and soil vapor for treatment. As part of the closure activities, the Facility implemented the closure plan approved by DTSC on November 13, 1990, and concluded that the site cannot be clean closed. DTSC issued a hazardous waste post-closure permit on June 30, 1994, to continue the remediation, monitoring and maintenance activities at the Facility.

6. Facility History

Prior to 1958, the site was used as farm land. The first building was built in 1958 and was occupied by a motorcycle repair shop until approximately 1964. A Freon recycler operated at the site until 1966 when the site was purchased by Baron-Blakeslee Co., Inc (BBI) which operated a bulk solvent recovery and distribution facility. Several corporation changes took place from 1970 to 1982.

On March 30, 1981, an interim status document allowing hazardous waste storage and treatment was issued to the Baron-Blakeslee Division of the Purex Corporation which implemented the closure activity at the site in 1991. The clean closure was not achieved and a final cover was installed over the entire Facility. The final cover consists of a combined six inches of reinforced concrete and asphalt cover, followed by six inches of aggregate base gravel, and followed by four inches of low permeability backfill material.

On February 16, 1993, DTSC acknowledged that the Facility was closed with waste in place and required the Facility to comply with interim status post-closure requirements until a post-closure permit is issued.

In 1994, a Post-Closure Hazardous Waste Facility Permit was issued to Purex Industries. In July 1999, Purex Industries, Inc. transferred all responsibility to Smith Remediation, Inc., which assumed post-closure care and corrective action responsibilities. On March 20, 2000, a permit modification was issued allowing the change of ownership from Purex Industries to Smith Remediation, Inc. and the change of the operator from Purex Industries to TP Industrial, Inc.

In 2001, Smith Remediation, Inc. merged to become TP Industrial, Inc. again. Respondent sold two parcels comprising 525 and 535 East Alondra Boulevard to the Guy R. Grant Living Trust. Mr. Guy R. Grant, trustee for the Guy R. Grant Living Trust owns and operates Arena Painting Contractors, Inc. TPI retains responsibility for assurance of financial responsibility for post-closure care and the operator status of the site to continue the post-closure and corrective action activities at the site.

In 2004, TPI submitted a permit renewal application to continue the post-closure activities. Since additional Investigations have been conducted at the TPI site as

part of the corrective action activities, TPI prepared a closure certification report to evaluate the closure status of each hazardous waste management unit based on new investigation results.

On February 29, 2008, the Facility submitted a closure certification report which summarized the closure activities performed at the Facility and identified that seven hazardous waste management units were clean closed without restrictions and four Hazardous Waste Managements Units (HWMUs) were closed with waste in place. The four HWMUs include the three former underground storage tanks (Unit 1), and the three-stage sump (Unit 2), and are the subject of this Permit. DTSC acknowledged this closure certification on November 11, 2008.

Unit 1 included three former underground tanks removed in 1986. The contents of the tanks included a liquid fraction and a sludge fraction which were also removed and properly disposed of. Subsequent soil, soil gas and groundwater investigation indicated that these three tanks are the source of volatile organic compounds that impacted soil and groundwater.

Unit 2 consisted of a below-grade, three-stage, concrete process wastewater collection sump and clarifier. The unit was used to treat wastewater contaminated with organic solvents. During closure, confirmation soil samples were taken at five (5) feet below ground surface and cis-1,2-dichloroethene and tetrachloroethene were detected. The unit and its content along with the impacted soil were removed. However, the Facility did not take any deeper samples and could not demonstrate its clean closure. On March 2, 2005, DTSC issued a letter concurring that the immediate contamination around the unit had been removed. DTSC also issued a letter on March 7, 2006 stating that no additional corrective measures for the shallow vadose zone were anticipated.

A final cover was installed over Units 1 and 2 as well as the entire Facility as part of the closure. The cover consists of six inches of reinforced concrete and asphalt cover, and underlain by six inches of aggregate base gravel and by four inches of low permeability backfill material.

The Facility signed a corrective action consent agreement with DTSC which requires the Facility to continue the investigation and remediation in accordance with the conditions described in the agreement. TPI is currently operating the soil venting and groundwater treatment system in accordance with a Permit-by-Rule issued by the County of Los Angeles, Fire Department Health Hazardous Materials Division, the Los Angeles County Certified Unified Program Agency (CUPA).

7. Facility Size and Type for Fee Purposes

The Facility is categorized as a **medium** post-closure Facility pursuant to Health and Safety Code section 25205.7(d)(5). For the purpose of Health and Safety

Code section 25205.4, the post-closure period for the Facility shall be deemed to have started on the issuance date of this permit.

### **PART III. GENERAL CONDITIONS**

#### **1. PERMIT APPLICATION DOCUMENTS**

The DTSC-approved Application dated October 29, 2009, (Approved Application) is hereby made a part of this Permit by reference except where superseded by the conditions of this Permit.

#### **2. EFFECT OF PERMIT**

- (a) The Permittee shall comply with the terms and conditions of this Permit and the provisions of the Health and Safety Code and California Code of Regulations (Cal. Code Regs.), title 22, division 4.5. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.
- (b) The Permittee is permitted to operate, monitor and maintain this Facility for post closure activities in accordance with the terms and conditions of this Permit and the Approved Application. Any management of hazardous wastes not specifically authorized in this Permit is strictly prohibited.
- (c) Compliance with the terms and conditions of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.
- (d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.
- (e) Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code section 25187.
- (f) Failure to submit any information required in connection with the Permit, or



falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (Cal. Code Regs., tit. 22, §66270.43).

- (g) In case of conflicts between the Approved Application and the Permit, the Permit conditions take precedence.
- (h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Facility by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code.

3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

A **Notice of Exemption** has been prepared in accordance with the requirements of Public Resources Code section 21000 et seq. and the CEQA Guidelines, section 15061(b)(3)] et seq. of California Code of Regulations, title 14.]

4. ENVIRONMENTAL MONITORING

The Permittee shall comply with the applicable environmental monitoring and response program requirements of California Code of Regulations, title 22, division 4.5, chapter 14, articles 6 and 17.

As of the date of this permit issuance, the Facility has not yet fully delineated lateral and vertical extent of the contaminated groundwater plume. As a result, the Facility must remain in the evaluation monitoring program until DTSC's approval of the corrective action monitoring program initiation. The following conditions shall supersede the groundwater monitoring information in the Approved Application dated September 12, 2008, should the information contradict the Part B application.

- (a) For the purpose of California Code of Regulations, title 22, section 66264.91(b), the elements of the monitoring and response program for the Facility are those described in Section E (Monitoring Requirements) and Appendix D (Revised Sampling and Analysis Plan Including the Quality Assurance Project Plan) of the Approved Application.
- (b) For the purpose of California Code of Regulations, title 22, sections 66264.92, the Water Quality Protection Standards for the Facility are described in Section E-2.1 of the Approved Application and Section 1.8 of Appendix D of the Approved Application.
- (c) For the purpose of California Code of Regulations, title 22, section

66264.93, the Constituents of Concern (COC) for the Facility are described in Section C of the Approved Application and Section 1.7 of Appendix D of the Approved Application. During future sampling events, if the Facility detects Appendix IX constituents in the groundwater that are not already identified as COCs, the Facility shall add them to the list of COCs in accordance with the Approved Application.

- (d) For the purpose of California Code of Regulations, title 22, section 66264.94, the Concentration Limits for the Facility are described in Section 1.8 of Appendix D of the Approved Application.
- (e) For the purpose of California Code of Regulations, title 22, section 66264.95, the Point of Compliance for permitted units are described in Section E-2.2 of the Approved Application and Section 3.1.3 of Appendix D of the Approved Application.
- (f) For the purpose of California Code of Regulations, title 22, section 66264.96, the Compliance Period for each regulated unit shall be 30 years beginning on the issuance date of this Permit. DTSC is extending the post-closure monitoring period beyond the original 30 year to protect human health and the environment. The Compliance Period may be reduced following the procedures described in California Code of Regulations, title 22, section 66264.117(b)(2)(A).
- (h) For the purpose of California Code of Regulations, title 22, section 66264.98, the Detection Monitoring wells are described in Section E-2.2 and Section 1.7 of Appendix D of the Approved Application.
- (i) For the purpose of California Code of Regulations, title 22, section 66270.31, the recording and reporting of monitoring results for the Facility is described in Section 8.0 of the Appendix D of the Approved Application.

5. ACCESS

- (a) DTSC, its contractors, employees, agents, and/or any United States Environmental Protection Agency representatives are authorized to enter and freely move about the Facility for the purposes of interviewing Facility personnel and contractors; inspecting records, operating logs, and contracts relating to the Facility; reviewing progress of the Permittee in carrying out the terms of Part VI of the Permit; conducting such testing, sampling, or monitoring as DTSC deems necessary; using a camera, sound recording, or other documentary-type equipment; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5. The Permittee shall provide DTSC and its representatives

access at all reasonable times to the Facility and any other property to which access is required for implementation of any provision of this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5, and shall allow such persons to inspect and copy all records, files, photographs, documents, including all sampling and monitoring data, that pertain to work undertaken pursuant to the entire Permit or undertake any other activity necessary to determine compliance with applicable requirements.

- (b) Nothing in this Permit shall limit or otherwise affect DTSC's right to access and entry pursuant to any applicable State or federal laws and regulations.

## 6. POST-CLOSURE COST ESTIMATE

The post closure cost estimate approved in 2009 is \$2,573,944.00 (in 2009 dollars) for the post-closure period from the year 2009 to 2039.

#### **PART IV. PERMITTED UNITS AND ACTIVITIES**

This Permit authorizes the operation, monitoring and maintenance only of the Facility units and activities listed below. The Permittee shall not treat, store or otherwise manage hazardous waste in any unit other than those specified in this Part IV. Any modifications to a unit or activity authorized by this Permit require the written approval of DTSC in accordance with the permit modification procedures set forth in California Code of Regulations, title 22, division 4.5.

For the purpose of California Code of Regulations, title 22, section 66270.1(c) and other similar, unit-specific regulatory requirements, this Facility has four (4) Hazardous Waste Management Units that are subject to post-closure requirements. These units are described in detail in the Approved Application, and are as follows:

##### **UNIT 1**

Three Former Underground Waste Solvent Storage Tanks

##### **LOCATION:**

The tanks were located at the northwestern corner of the facility. These three underground tanks also identified as HWMUs 1, 2, and 3 are shown in Figure 2.

##### **ACTIVITY TYPE:**

Groundwater monitoring and cap maintenance

##### **ACTIVITY DESCRIPTION:**

The groundwater monitoring and final cover inspection and maintenance conducted by the Facility in according to the conditions specified in the Approved Application and this Permit.

##### **PHYSICAL DESCRIPTION:**

The three former underground storage tanks included one 7,500-gallon-tank and two 5,000-gallon-tanks were removed. The area is covered by a concrete cap.

##### **WASTE TYPES:**

Waste in Unit 1 includes soil and groundwater contaminated with residual organic solvents related to the former tanks. The contaminants left in place include: 1,1,1-trichloroethane, trichloroethene, tetrachloroethene, methylene chloride, Freon-113, 1,1-dichloroethane, and 1,2-dichloroethane.

AIR EMISSION STANDARDS

The tanks were closed and removed; therefore, air emission standards are not applicable to the unit.

## UNIT 2

A former three Stage Wastewater Clarifier (also known as the Three-Stage Sump)

### LOCATION:

The unit was located in the single-pass still room located to the southeast of Unit 1. The clarifier is identified as Hazardous Waste Management Unit 10 in Figure 2.

### ACTIVITY TYPE:

Groundwater monitoring and cap maintenance

### ACTIVITY DESCRIPTION:

The groundwater monitoring and final cover inspection and maintenance conducted by the Facility in according to the conditions specified in the Approved Application and this Permit.

### PHYSICAL DESCRIPTION:

The unit consisted of a former concrete process wastewater collection sump and clarifier. The area is currently covered by a concrete cover.

### WASTE TYPES:

Waste in Unit 2 includes soil and groundwater contaminated with residual organic solvents related to the former clarifier. The contaminants left in place include cis-1, 2-dichloroethene and tetrachloroethene.

### AIR EMISSION STANDARDS

These units were closed and removed; therefore, the air emission standards are not applicable.

**PART V.     SPECIAL CONDITIONS**

1.     Within 90 days of the issuance of the permit, the Permittee shall submit a statistical method for determining background concentration values in compliance with California Code of Regulations, title 22, section 66264.97.
2.     The Permittee shall not discontinue any groundwater monitoring and/or analysis at any groundwater monitoring wells at the Facility unless approved by DTSC.
3.     The Permittee shall request an approval from DTSC as described in Approved Application , Section E-2, to (1) reduce the monitoring frequency from quarterly to semi-annual, (2) discontinue the Appendix IX analyses, or (3) discontinue the monitoring of analytes which have not been detected for three consecutive years. Upon receipt of the request, DTSC will determine whether a permit modification is necessary to reduce and/or discontinue the monitoring required by this Permit.

## PART VI. CORRECTIVE ACTION

Initial site assessment activities, performed in 1982 with oversight by the Regional Water Quality Control Board (RWQCB), revealed solvents in both soil and ground water beneath the Facility and offsite as a result of leaks from operations at the Facility. All underground and above ground storage tanks were removed in 1986. The Facility initiated and continues to investigate the extent of the releases. With the approval from the Regional Water Quality Control Board, the Facility initiated the operation of a groundwater extraction and treatment system in 1988 and a soil vapor extraction and treatment system in 1993 to control the releases.

The Facility will continue the operation of the groundwater and soil vapor extraction and treatment systems, investigation and remediation activities under the corrective action activities.

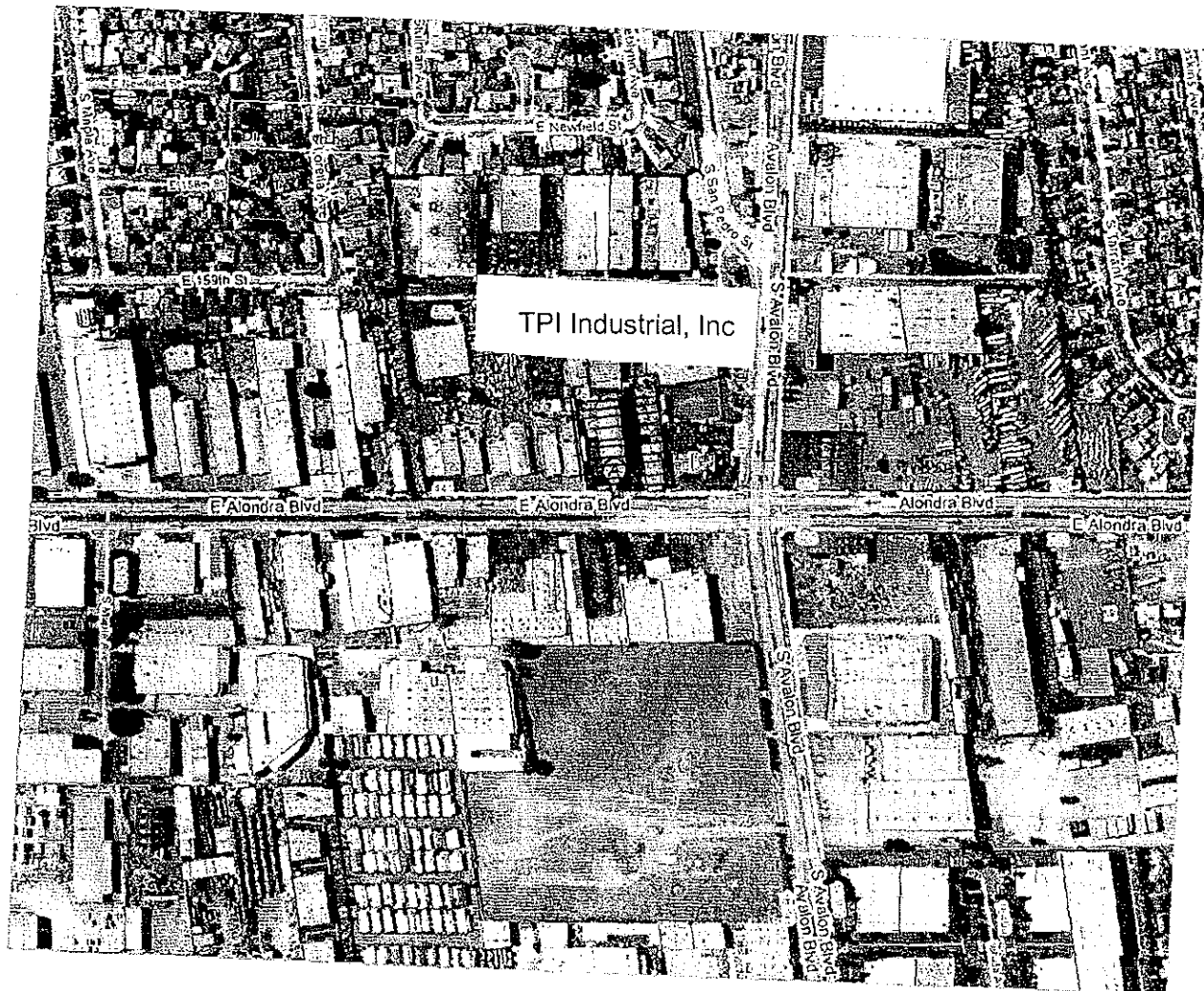
1. The Permittee shall conduct corrective action at the Facility pursuant to Health and Safety Code sections 25187 and 25200.10. Corrective action shall be carried out under the Corrective Action Consent Agreement, Docket No. P3-09/10-003.
2. To the extent that work being performed pursuant to Part VI of the Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete work required by this Part of the Permit from the present owner(s) of such property within 30 days of approval of any workplan for which access is required. "Best efforts" as used in this paragraph shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within 30 days of approval of any workplan for which access is required, or of the date that the need for access becomes known to the Permittee, the Permittee shall notify DTSC in writing within 14 days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property. If there is any conflict between this permit condition on access and the access requirements in any agreement entered into between DTSC and the Permittee, this permit condition on access shall govern.
3. Nothing in Part VI of the Permit shall be construed to limit or otherwise affect the Permittee's liability and obligation to perform corrective action including corrective action beyond the facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site measures must be taken to address



releases beyond the Facility boundary if access to off-site areas cannot be obtained.

4. As directed by DTSC, after DTSC's approval of the Interim Measures Workplan and/or after selection by DTSC of the corrective measures, Respondent shall establish a financial assurance mechanism for Interim Measures and/or Corrective Measures Implementation. The financial assurance mechanisms may include any mechanism described in California Code of Regulations, title 22, sections 66264.143. The mechanism shall be established to allow DTSC access to the funds to undertake Interim Measures and /or Corrective Measures if Respondent is unable or unwilling to undertake the required actions.

Figure 1 Facility Location



TPI INDUSTRIES  
525/535 EAST ALONDRA BOULEVARD  
GARDENA, CALIFORNIA

